

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., et al.;)

)

)

Plaintiffs,)

)

v.)

Case No.: 16-cv-3311-ELH

)

LAWRENCE HOGAN, et al.;)

)

)

Defendants.)

)

DECLARATION OF CONNOR M. BLAIR

I, Connor Blair, under penalty of perjury, declare and state as follows:

1. I am an attorney at Bradley Arant Boult Cummings LLP. I am over the age of 18 and am competent to testify, upon personal knowledge, to the matters stated below.

2. Attached as Exhibit 1 to Plaintiffs' Memorandum in Support of Cross-Motion for Summary Judgment and in Opposition to Defendants' Motion for Summary Judgment ("Plaintiffs' Cross-Motion") is a true and correct copy of the Redacted Declaration of Stephen Schneider, dated October 3, 2018. The unredacted declaration is filed under seal identified as ECF 77-01.

3. Attached as Exhibit 2 to Plaintiffs' Cross-Motion is a true and correct copy of the Declaration of Mark Pennak, dated January 22, 2021, including true and correct copies of its accompanying exhibits.

4. Identified as Exhibit 9 to Plaintiffs' Cross-Motion is a true and correct copy of the 77R Handgun Registration presentation produced by Defendants in this case, in CD-Rom format previously filed and identified as ECF 77-09.

5. Attached as Exhibit 14 to Plaintiffs' Cross-Motion is a true and correct copy of Defendants William M. Pallozzi's Third Supplemental Answers to Plaintiff Atlantic Guns, Inc.'s First Set of Interrogatories and a true and correct copy of Assistant Attorney General Robert Scott's October 30, 2020 email that updates the number of HQL applications initiated but not submitted as final to the Maryland State Police.

6. Attached as Exhibit 15 to Plaintiffs' Cross-Motion is a true and correct copy of Deposition Exhibits 48, 105, and 106 and a true and correct copy of Maryland State Police Firearm Transfer Data emailed by Mr. Scott on October 27, 2020.

7. Attached as Exhibit 20 to Plaintiffs' Cross-Motion is a true and correct copy of Defendant William M. Pallozzi's Answers to Plaintiff Atlantic Guns, Inc.'s First Set of Interrogatories.

8. Attached as Exhibit 21 to Plaintiffs' Cross-Motion is a true and correct copy of the Handgun License administrative log produced by Defendants in this case as bates MSP Supplemental Production Jan.2021_000001-Jan.2021_000199. To calculate the number of applications that were administratively denied after thirty days because the safety course instructor or fingerprint vendor had failed to timely submit the Firearms Safety Training Certificate to the Maryland State Police or live-scan fingerprints to the Central Repository, I reviewed the reasons for disapproval, identified applications added to the administrative log due to livescan, training, or instructor reasons, and added the total number of these applications.

9. Attached as Exhibit 22 to Plaintiffs' Cross-Motion is a true and correct copy of a chart of Maryland crime statistical data and its accompanying exhibits that support the chart.

10. Attached as Exhibit 23 to Plaintiffs' Cross-Motion is a true and correct copy of the Declaration of Carlisle Moody, dated October 3, 2018, including true and correct copies of its accompanying exhibits.

11. Attached as Exhibit 24 to Plaintiffs' Cross-Motion is a true and correct copy of the Declaration of Gary Kleck, dated October 4, 2018, including true and correct copies of its accompanying exhibits.

12. Attached as Exhibit 28 to Plaintiffs' Cross-Motion is a true and correct copy of the Supplemental Declaration of Gary Kleck, dated January 26, 2020, including true and correct copies of its accompanying exhibits.

I declare and affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

/s/ Connor M. Blair
Connor M. Blair

January 27, 2021
Date